


EXHIBIT A

Approved: 
 SARAH L. KUSHNER
 Assistant United States Attorney

Before: THE HONORABLE ONA T. WANG
 United States Magistrate Judge
 Southern District of New York

20 MAG 11665

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UNITED STATES OF AMERICA

- v. -

WILLIE DENNIS,

Defendant.

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SEALED COMPLAINT

Violations of
 18 U.S.C. §§ 2261A
 and 2

COUNTY OF OFFENSE:
 NEW YORK

SOUTHERN DISTRICT OF NEW YORK, ss.:

ELISABETH WHEELER, being duly sworn, deposes and says
 that she is a Special Agent with the Federal Bureau of
 Investigation ("FBI"), and charges as follows:

COUNT ONE
 (Cyberstalking)

1. Since at least in or about 2018, up to and including
 the present, in the Southern District of New York and elsewhere,
 WILLIE DENNIS, the defendant, with the intent to injure, harass,
 and intimidate another person, used the mail, interactive
 computer services and electronic communication services and
 electronic systems of interstate commerce, and other facilities
 of interstate and foreign commerce, including electronic mail,
 phone calls, text messages, and faxes, to engage in a course of
 conduct that caused, attempted to cause, and would be reasonably
 expected to cause substantial emotional distress to a person, to
 wit, DENNIS has engaged in a campaign of harassment,
 intimidation, and threats against an individual ("Victim-1") who
 works in New York, New York, including by sending harassing,
 threatening, and intimidating emails and text messages to
 Victim-1.

(Title 18, United States Code, Sections 2261A(2)(B) and 2.)

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COUNT TWO

(Cyberstalking)

2. In or about 2019, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic systems of interstate commerce, and other facilities of interstate and foreign commerce, including electronic mail, phone calls, text messages, and faxes, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS has engaged in a campaign of harassment, intimidation, and threats against an individual ("Victim-2") who works in New York, New York, including by sending harassing, threatening, and intimidating text messages to Victim-2.

(Title 18, United States Code, Sections 2261A(2)(B) and 2.)

COUNT THREE

(Cyberstalking)

3. From at least in or about 2018, up to and including at least in or about October 2020, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the intent to injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic systems of interstate commerce, and other facilities of interstate and foreign commerce, including electronic mail, phone calls, text messages, and faxes, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS has engaged in a campaign of harassment, intimidation, and threats directed at an individual ("Victim-3") who works in New York, New York, including by sending harassing, threatening, and intimidating text messages to Victim-3.

(Title 18, United States Code, Sections 2261A(2)(B) and 2.)

COUNT FOUR

(Cyberstalking)

4. From at least in or about 2019, up to and including the present, in the Southern District of New York and elsewhere, WILLIE DENNIS, the defendant, with the intent to

injure, harass, and intimidate another person, used the mail, interactive computer services and electronic communication services and electronic systems of interstate commerce, and other facilities of interstate and foreign commerce, including electronic mail, phone calls, text messages, and faxes, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to a person, to wit, DENNIS has engaged in a campaign of harassment, intimidation, and threats directed at an individual ("Victim-4") who works in New York, New York, including by sending harassing, threatening, and intimidating emails and text messages to Victim-4.

(Title 18, United States Code, Sections 2261A(2)(B) and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

Overview

5. As set forth in greater detail below, WILLIE DENNIS, the defendant, has engaged in a long-term and pervasive campaign of harassment, intimidation, and threats directed at former colleagues (the "Victims") at his former law firm (the "Law Firm"). Specifically, since in or about 2018, and up to and including the present, DENNIS has sent more than one thousand emails, text messages, and fax communications to the Victims.¹ DENNIS has sent threatening messages to the Victims at all hours of the day and night, often in rapid succession; the Victims did not respond to such messages or otherwise engage with DENNIS in response to his threatening communications. Through his unrelenting communications, as well as phone calls and voicemails to Victims, DENNIS has threatened and sought to intimidate and stoke fear in the Victims and their families.

6. In these communications, WILLIE DENNIS, the defendant, has made false accusations against the Victims and the Law Firm, portrayed the Law Firm and its senior members as having discriminated against him based on his race, and complained about his termination from the Law Firm. DENNIS has also threatened physical harm to certain Victims and threatened to visit Victims and their families at their homes. On or about October 9, 2020, for example, DENNIS called a senior member of the Law Firm and stated, in substance and in part: "someone is

¹ For example, between on or about May 13, 2019, and on or about September 20, 2019, WILLIE DENNIS, the defendant, sent at least hundreds of written communications to Victims. Between on or about September 4, 2019, and on or about September 20, 2019, alone, DENNIS sent at least approximately 200 hundred written communications to Victims and other members of the Law Firm.

going to get physically hurt and it is not someone who deserves to be hurt."

7. The unrelenting harassment campaign and cyberstalking by WILLIE DENNIS, the defendant, against the Victims has caused or would be reasonably expected to cause the Victims substantial emotional distress and fear for their physical safety. At least one Victim has been forced to leave New York and relocate to another state as a result of DENNIS's ongoing threats and efforts to harass and intimidate his former colleagues. Another Victim has had to change the location of his/her parking garage and upgrade his/her home security system.

The Defendant

8. Based on my conversations with senior members of the Law Firm, I have learned, among other things, that for fourteen years, WILLIE DENNIS, the defendant, was an attorney at the Law Firm, based in New York City. DENNIS joined the Law Firm in or about 2005, and became an equity partner. DENNIS worked at the Law Firm's New York office, located in the Southern District of New York, until he was terminated on or about May 13, 2019. DENNIS was terminated from the Law Firm for erratic and threatening behavior, as well as his years-long poor performance as a partner.

9. Based on my conversations with senior members of the Law Firm and my review of travel records obtained from law enforcement databases, I have learned, among other things, that WILLIE DENNIS, the defendant, resides in New York, New York, although he has been in the Dominican Republic since at least in or about February 2020.

10. Based on my conversations with senior members of the Law Firm, I know that WILLIE DENNIS, the defendant, is Black, as are certain of his Victims.

The Victims

11. Based on my conversations with senior members of the Law Firm and Victims, I have learned, among other things, that the Victims are prominent attorneys at the Law Firm and/or members of the Law Firm's management committee. The Victims knew WILLIE DENNIS, the defendant, in a professional capacity. Certain Victims worked closely with DENNIS on matters at the Law Firm.

12. Based on my conversations with senior members of the Law Firm and Victims, I have learned that the Victims work in the Law Firm's New York office.

Victim-1

13. Based on my interview with a senior member of the Law Firm ("Victim-1"), and my review of electronic communications, including emails and text messages that Victim-1 received from WILLIE DENNIS, the defendant, I have learned that DENNIS engaged in a pattern of harassment, intimidation, and threats directed at Victim-1.

14. Based on my review of communications sent by WILLIE DENNIS, the defendant, to Victim-1 and other attorneys at the Law Firm, I believe that DENNIS's messages are intended to intimidate and stoke fear in the recipients, including Victim-1. For example, in some messages, DENNIS refers to recent mass shootings and other violence reported in the news; in others, DENNIS quotes violent scripture passages and references God. For example:

a. On or about July 14, 2019, DENNIS, using one of his Gmail accounts ("Email Account-1"), sent the following biblical passage to Victim-1 and another Law Firm employee: "The Lord preserves all that love Him, but the wicked He will destroy," to which DENNIS then stated "Amen."

b. On or about August 4, 2019, DENNIS, using one of his Gmail accounts ("Email Account-2"), sent Victim-1 and another Law Firm employee an email about a "mass shooting in downtown Dayton" that left 9 dead and 16 injured, and stated: "[h]eading to service now and will pray on this as well as our issues." On or about August 7, 2019, DENNIS, from a different Gmail account ("Email Account-3"), sent Victim-1 and two other Law Firm employees a copy of the front page of a newspaper picturing the "Dayton terrorist."

c. On or about August 8, 2019, DENNIS, using Email Account-2, sent Victim-1 and another Law Firm employee a link to an article about a mass stabbing in California in which 4 people were killed and 2 were injured. In the email, DENNIS included the following quote from the article, specifically emphasizing that the suspect's motive was "anger and hate" by underlining those two words in the email: "The suspect's motive appears to be robbery, anger and hate."

d. On or about August 10, 2019, DENNIS, using Email Account-2, sent a message to Victim-1 and another Law Firm employee in which DENNIS quoted another biblical passage: "evildoers . . . shall soon be cut down like green herb." That email also contained a link to an article about Jeffrey Epstein's suicide.

e. On or about August 31, 2019, DENNIS, using Email Account-2, sent Victim-1 and another Law Firm employee a link to an article about a mass shooting in Texas, in which 5 people were killed, and 21 injured.

15. Based on my review of communications received by Victim-1, I have learned that WILLIE DENNIS, the defendant, has also threatened Victim-1 and Victim-1's family. For example, DENNIS sent the following messages to Victim-1:

a. In or about May 2020, DENNIS, using a phone number subscribed to in his name ("Phone Number-1"), sent back-to-back text messages to Victim-1 and two other members of the Law Firm, accusing Victim-1, among other things, of being a racist. For example:

I am sure [REDACTED] was a
dirty prosecutor
...just have to find the
case and put your
punk ass in jail

4 officers commit
murder but in [REDACTED]
racist
mind, the three that
were watching were
innocent

Right racist ?

you cunt you start
things like this and
then blame others

Any dirty move to
win [REDACTED] right ?

and fix your damn bio
punk

[REDACTED]
What is God's racial
profile ?

b. Between on or about August 25, 2020, and on or about August 26, 2020, DENNIS sent several members of the Law Firm, including Victim-1, approximately 71 back-to-back text messages, using Phone Number-1.

c. Between on or about August 27, 2020, and on or about August 28, 2020, DENNIS sent several members of the Law Firm, including Victim-1, approximately 50 back-to-back text messages, using Phone Number-1.

d. Between on or about August 29, 2020, and on or about August 30, 2020, DENNIS sent several members of the Law Firm, including Victim-1, approximately 110 back-to-back text messages, using Phone Number-1.

e. On or about September 6, 2020, DENNIS, using Phone Number-1, sent approximately 19 back-to-back text messages to several members of the Law Firm, including Victim-1. In one text message in the chain, DENNIS, referring to a complaint that the Law Firm allegedly made to the New York City Police Department (the "NYPD") about DENNIS's conduct, states:

"1 That by going to my wife with information about me which you will not share and

2 sending police [] to my family home . . .

U introduced children and family into this mix."

f. On or about September 8, 2020, DENNIS, using Phone Number-1, sent back-to-back text messages to Victim-1 and another member of the Law Firm. The text messages were increasingly belligerent and threatening. In one text message in the chain, DENNIS states, "I am a witness to you killing God's children. Do u expect me to do nothing ?" In the same chain, DENNIS states:

"Killing children

Who is insane?

Who is offensive in the eyes of the Lord!

and all u say in unison

'Willie Dennis'"

g. On or about October 7, 2020, Victim-1 received approximately 98 text messages from DENNIS, using Phone Number-1.

h. Between or about October 8, 2020, and on or about October 9, 2020, Victim-1 received approximately 52 text messages from DENNIS, including messages that threatened Victim-1's family. One such message stated, in part, "Look forward to many evening chatting[. . . .] Anything I do will never repay you for all what you have done to me and my family . . . but I am going to try. I am going to research your family as you did mine." In another message, DENNIS asked how things were going at Victim-1's children's school, and then stated: "Still less than putting your sons' lives in jeopardy ...right." That message was followed by an image of a black male, with the heading "Why am I dead?" In two other messages, DENNIS called Victim-1 a "[b]igot." In yet another message, DENNIS stated: "u r a bad person that deserves to be severely punished (figuratively we both know what a liar u r)." DENNIS sent these messages using Phone Number-1.

16. Based on my review of communications received by Victim-1 and my conversations with Victim-1, I know that the messages discussed above are just a small sample of the threatening communications that WILLIE DENNIS, the defendant, has sent Victim-1.

17. Based on my conversations with Victim-1, I have learned that Victim-1 and Victim-1's spouse and children have experienced, and are continuing to experience, great distress as a result of the unrelenting barrage of messages that WILLIE DENNIS, the defendant, has sent to Victim-1.

Victim-2

18. Based on my conversations with another senior member of the Law Firm ("Victim-2"), who is Black, I have learned, among other things, that in or about 2019, WILLIE DENNIS, the defendant, using Phone Number-1, sent Victim-2 harassing text messages, causing Victim-2 to "block" communications from DENNIS's phone.

19. Based on my conversations with Victim-2, I have learned about specific instances of harassing conduct by WILLIE DENNIS, the defendant, against Victim-2, including as follows:

a. In or about June 2019, after DENNIS had been terminated from the Law Firm, Victim-2 traveled to a professional conference outside of New York. Victim-2 saw DENNIS at the conference. While Victim-2 was speaking to other conference attendees at a networking reception, DENNIS approached Victim-2 and spoke to Victim-2 in a loud and angry manner. DENNIS insisted on talking about the Law Firm. Victim-2 told DENNIS that Victim-2 did not wish to discuss the firm, and turned away from DENNIS. That night, DENNIS, using Phone Number-1, sent Victim-2 a barrage of text messages. In those messages, DENNIS, among other things, accused the Law Firm, in sum and substance, of taking money from DENNIS and his children. At a breakfast the next morning, DENNIS found Victim-2 and began complaining very loudly about the Law Firm and its alleged disinterest in diversity. Victim-2 left the room. DENNIS followed Victim-2 and took photos of Victim-2. Finally, because DENNIS would not stop following Victim-2, Victim-2 had to leave the conference.

20. Based on my conversations with Victim-2, I have learned, among other things, that Victim-2 stopped going to conferences and other industry meetings because Victim-2 feared that WILLIE DENNIS, the defendant, would be present.

Victim-3

21. Based on my conversations with another senior member of the Law Firm ("Victim-3"), I have learned, among other things, that:

a. Victim-3 has known WILLIE DENNIS, the defendant, for many years.

b. Victim-3 and DENNIS used to socialize together and spend time with each other's families. DENNIS has been to events at Victim-3's home and knows Victim-3's children.

22. Based on my conversations with Victim-3 and my review of documents collected from Victims and other members of the Law Firm, I have learned, among other things, that since in or about early 2020 through the present, WILLIE DENNIS, the defendant, using Phone Number-1, has sent Victim-3 at least hundreds of text messages containing harassing and intimidating statements, including threats directed at Victim-3 and Victim-3's family. For example:

a. On or about September 1, 2020, DENNIS, using Phone Number-1, sent back-to-back text messages to Victim-3 and three other recipients, including text messages in which DENNIS threatened to "kill" Victim-3 and Victim-3's "kids":

kill u and or your kids

b. Among the texts that DENNIS sent Victim-3 on or about September 1, 2020, was a text that stated: "you r willing to assist in breaking 'one' of God's Ten Commandments[:] 'Thou shall not kill.'" "

Victim-4

23. Based on my conversations with partners at the Law Firm and others and my review of messages received by the Victims, I have learned that WILLIE DENNIS, the defendant, has also cyberstalked another partner at the Law Firm ("Victim-4"), who is Black.

24. Based on my review of messages Victim-4 received from WILLIE DENNIS, the defendant, I have learned, among other things, that since at least in or about March 2019, DENNIS has sent a barrage of back-to-back text messages to Victim-4, including, for example, the following text messages:

a. On or about September 2, 2019, DENNIS, using Phone Number-1, sent back-to-back text messages to Victim-4, including the following message:

"Finally i urged you not to share my texts with them [i.e., other members of the Law Firm]... but you did.

In the Firms criminal complaint against me some of the texts you passed along are included.

Also our accidental meeting in the restaurant is noted as a 'threatening encounter.'"

25. Based on my review of threatening communications Victim-4 received from WILLIE DENNIS, the defendant, I have also learned that DENNIS attacked Victim-4 for allegedly "hav[ing] undercover Chicago police officers . . . attend" a Corporate Counsel Women of Color conference. For example, in or about 2019, using Phone Number-1, DENNIS sent Victim-4 the following text messages, among many others:

a. "[A] major supporter of [the conference] of course is aware of the gunmen you and the other partners sent to the 'women's conference' . . . i would be prepared if it should ever arise to explain why you[] thought it was necessary or how you tried to prevent it. Anything less will raise eyebrows."

b. "More thoughts . . . and I am protecting your reputation so i hope you do not give them anything else[.] Do you think they could send armed men into a diverse women's conference with out good reason and get away with it[.] As i told [other members of the Law Firm] at the time if i had sent armed undercover investigators in to a conference where . . . there [were] women and children[,] they would have[,] and rightly so, put me in lockdown ...forever[.] I am looking for equality and intend to do the same to them."

c. "If someone had been injured at the Conference by the Chicago police officers in the room, what would you have stated in the police report as to the reason for the officers being there ? . . . Were you[r] actions 'reasonable' biscuit head or purely self interested ?"

d. "Your failure to adequately protect other women of color is reprehensible[.] Your 'intentional' actions which endangered women of color at the . . . conference (engaging Chicago police officers to walk undisclosed among the women attendees) are reprehensible."

26. Based on my review of text messages WILLIE DENNIS, the defendant, sent to Victim-4, I have also learned that DENNIS falsely accused Victim-4 of having an extramarital affair with another member of the Law Firm and sent Victim-4 other inappropriate text messages with false claims about Victim-4's dating and sex life. For example, using Phone Number-1, DENNIS sent the following messages to Victim-4:

Your quick rise to influence in the New York office is clearly related to how close you are with [REDACTED] 🧡💕

You and [REDACTED] always spend a lot of time together working on projects, I assumed that is how the two of you became so close 🧡💕

and you learned all thru [REDACTED] [REDACTED] whispering "sweet nothings " in your ears 🧡
Are u with him tonight 🧡💕

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i know u like married men ..but
in the office ?

Is your " Tinder " account still
active ?

How man " hook ups " did you
get on Tinder ?

Does [REDACTED] know about your
Tinder account ?

* * *

Does your mother know about
your relationship with [REDACTED] ?

* * *

And no Tinder booty calls for
you this week

u are onlockdown 😂

u know me now clown 🤡

How many dudes did you find
on Tinder ?

* * *

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What was the quality of the
d...😂

i always knew this
was more your type of
conversation

Always the quiet ones 😂

27. In falsely accusing Victim-4 of having an extramarital affair, WILLIE DENNIS, the defendant, using Phone Number-1, warned Victim-4 not to lie about it: "don't perjure yourself because I will push for prison time for you."

28. Based on my review of messages received by Victim-4, I have learned that there are many other text messages that WILLIE DENNIS, the defendant, sent to Victim-4 as part of DENNIS's campaign of harassment and cyberstalking. Here are just a few more examples:

a. "Let's fill up your 'evil' files[.] Did not fool me. Was hoping you would change but ...gutter to the end"— "[s]o let's send you back there."

b. "U wished the police [] had killed me[.] No need to answer[.] God just read your mind. I have to go talk to a few other 'unholies' but will come back to you later."

c. "In fact until now and only since God has commanded me to act against your falsehoods."

d. "U know u deserve whatever comes your way during this 'biblical moment.'"

e. "God has now commanded me to call out you[r] actions which are so offensive in his eyes."

f. "You need to practice outside of New York. Because if you stay in New York i am going to follow u till u answer my questions cotton head."

g. "They like to make examples. I am going to make one of u u u u."

h. "U really need to leave the New York office soon ..like in a week or so you will become part of the public conversation."

i. "You are going to be a 'biblical symbol' during this time of injustice and hatred of what happens when you are offensive in the eyes of the Lord."

29. Based on my review of documents collected from Victim-4, I have learned that, on or about October 5, 2020, Victim-4 received more than approximately 68 text messages from WILLIE DENNIS, the defendant, who sent those messages using Email Account-3.

30. Based on my review of documents collected from Victim-4, I have learned that, on or about October 6, 2020, Victim-4 received approximately 46 text messages from WILLIE DENNIS, the defendant, who sent those messages using Email Account-3.

31. Based on my review of documents collected from Victim-4, I have learned that between approximately 1:00 a.m. on or about October 8, 2020, and 6:00 a.m. on or about October 9, 2020, WILLIE DENNIS, the defendant, using Email Account-3, sent Victim-4 approximately 98 text messages, including as follows:

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If you escape jail
for all this stuff i will be
surprised because i am going
to do my darndest

Somebody has to get stuck
and you have the statements in
the public records and the
public statements so

...looks like you...

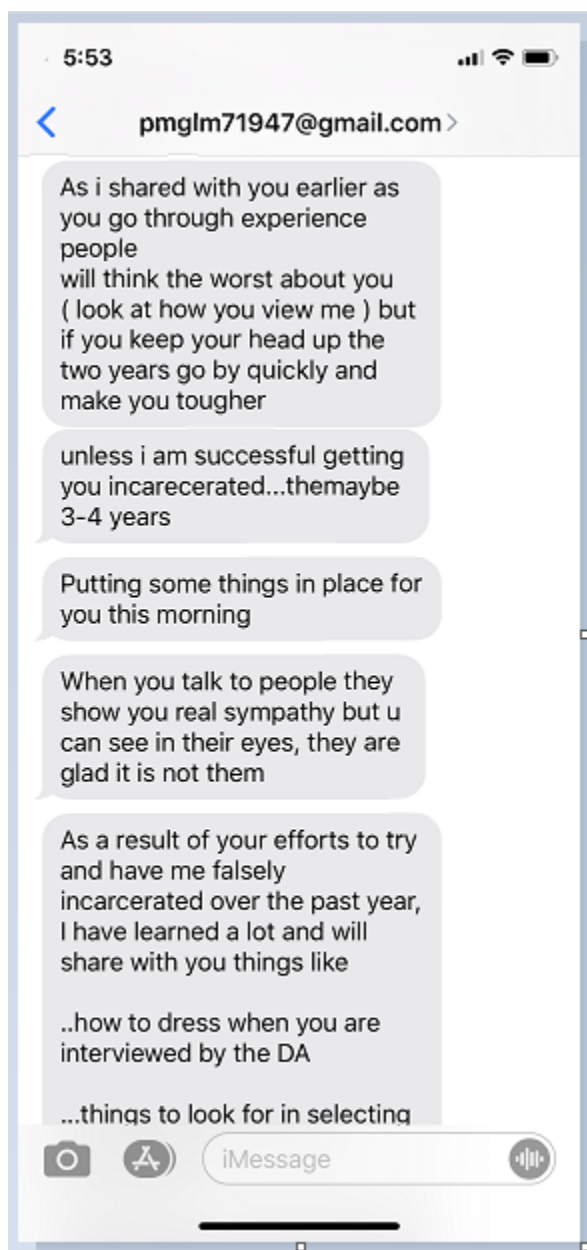
Think you can avoid

1 Perjuy criminal
court

2 Defamation /slander /civil
court
more to follow

Can you win them
all ..one loss and

17



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32. On or about October 10, 2020, Victim-4 received approximately 29 text messages from WILLIE DENNIS, the defendant, who sent those text messages using Email Account-3.

33. Based on my conversations with senior members of the Law Firm and others, I have learned that Victim-4 has had to leave New York and relocate to another state as a result of WILLIE DENNIS's, the defendant's, conduct.

DENNIS Controlled Phone Number-1 And The Email Accounts

34. Phone Number-1: As set forth above, see ¶¶ 15, 18, 19, 22, and 24-27, WILLIE DENNIS, the defendant, used Phone Number-1 to send harassing and threatening communications to Victim-1 and Victim-4, among others. Based on records obtained from AT&T pursuant to a subpoena, I have learned that the subscriber of Phone Number-1 is "Willie Dennis" and has the same date of birth and Social Security number as DENNIS. In addition, based on my conversations with members of the Law Firm, I have learned that Phone Number-1 is the cellphone number that the Law Firm had on file for DENNIS and that the Victims and other members of the Law Firm had in their phones for DENNIS.

35. Email Account-1: As set forth above, see ¶ 14(a), WILLIE DENNIS, the defendant, used Email Account-1 to send harassing and threatening communications to Victim-1. Based on records obtained from Google pursuant to a subpoena, I have learned that the subscriber of Email Account-1 is "Willie Dennis." Moreover, the recovery email for Email Account-1 is Email Account-3, another one of DENNIS's accounts, and the phone number listed for Email Account-1 is Phone Number-1.

36. Email Account-2: As set forth above, see ¶¶ 14(b)-(e), WILLIE DENNIS, the defendant, used Email Account-2 to send harassing and threatening communications to Victim-1. Based on records obtained from Google pursuant to a subpoena, I have learned that the subscriber of Email Account-2 is "Willie Dennis." Moreover, the phone number listed for the account is Phone Number-1.

37. Email Account-3: As set forth above, see ¶¶ 14(b) and 29-31, WILLIE DENNIS, the defendant, used Email Account-3 to send harassing and threatening communications to Victim-1 and Victim-4. Based on records obtained from Google pursuant to a subpoena, I have learned that the subscriber of Email Account-3 is "Willie Dennis." Moreover, the phone number listed for the account is Phone Number-1.

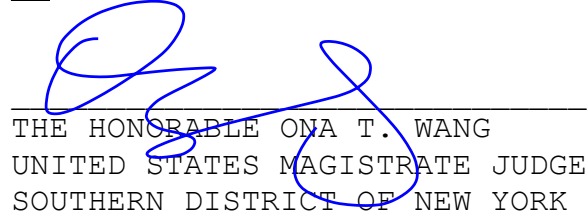
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WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of WILLIE DENNIS, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

s/Elisabeth Wheeler /orn
Special Agent Elisabeth Wheeler
Federal Bureau of Investigation

Sworn to me through the transmission of this Affidavit by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 41(d)(3) and 4.1 this,

28th day of October, 2020



THE HONORABLE ONA T. WANG
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK